



CALIFORNIA ASSOCIATION OF REALTORS®

July 17, 2017

Ajit Pai, Chairman
Federal Communications Commission
455 12th St., SW
Room TW-A325
Washington, DC 20554

2017 OFFICERS

GEOFF MCINTOSH
President

STEVE WHITE
President-Elect

JARED MARTIN
Treasurer

JOEL SINGER
Chief Executive Officer/
State Secretary

Re: Proposed Rule WC Docket No. 17-108

Dear Chairman Pai;

I am writing on behalf of the more than 190,000 members of the California Association of REALTORS® (C.A.R.) to **OPPOSE** the Notice of Proposed Rulemaking (NPRM) *"In the Matter of Restoring Internet Freedom."* C.A.R. is asking the Federal Communications Commission (FCC) to NOT adopt the proposed rule which would hinder internet access, incentivize "fast-lanes" and/or "paid prioritization," and create opportunities of conflict of interests where internet service providers (ISP) and internet content providers are owned by the same company. The FCC must maintain a "net-neutrality" policy that prioritizes the ability of consumers to access ALL internet content at the same speed.

As the nation's largest state trade association, C.A.R. represents real estate agents and brokers who exemplify how businesses of any size can compete and thrive when presented with a level playing field that applies rules evenly across all participants. A real estate broker can be as large as 20,000 agents or as small as a one-person shop, both of which can be successful. In addition, new real estate brokers can easily enter the market place. This has led to greater competition, improved customer service and increased innovation.

SUPPORT FOR NET-NEUTRALITY



REALTOR® is a federally registered collective membership mark which identifies a real estate professional who is a Member of the NATIONAL ASSOCIATION OF REALTORS® and subscribes to its strict Code of Ethics.



This openness and level playing field in real estate is similar to what the internet has been over its 20-years of existence. However, a truly open internet would be directly threatened should the NPRM be implemented and ISPs be allowed to create fast-lanes that will discriminate against small companies, create barriers to entry, hinder creativity and development, and ultimately hurt consumers by increasing costs and prohibiting access to new and innovative websites.

C.A.R. opposes the NPRM because it will allow ISP to ignore net-neutrality and implement paid prioritization business models and/or the creation of fast lanes that would allow internet content to be provided to consumers at a different speed than other content. No amount of regulation or transparency can stop the harm that eliminating net-neutrality will have on consumers and the economy. C.A.R. is concerned the elimination of net-neutrality will lead to only large companies benefiting and hindering the ability of small and new companies to compete. The only solution to avoiding needless rules and what will ultimately be a lack of transparency is to continue to require net-neutrality.

NET NEUTRALITY'S IMPACT ON REAL ESTATE

Over the last 20-years real estate, and the home buying and home selling process, have become more dependent upon the internet and use of smart devices. In order to assure a continued level playing field in our industry going forward net-neutrality must be maintained so brokers of all sizes and means are able to compete. Real numbers indicate the need. Recent surveys of home buyers and home sellers in California showed:

- 91-percent of buyers used a mobile device in the home buying process,
- 50-percent of sellers found their real estate agent online,
- 97-percent of buyers used the internet, and
- 77-percent of buyers used social media

The implementation of a paid prioritization or fast-lane on the internet where one broker would have a competitive advantage over another would create an uneven playing field. Real estate, like all other industries, has become more competitive because of net-neutrality and the winner of this has been the consumer and the process by which they buy and sell real estate.

Moving away from net-neutrality would harm the industry and the gains made over the last two decades. The FCC must take the necessary steps to ensure that net-neutrality and the equal treatment of all content by ISPs are the primary components of an open internet.

We would be happy to discuss any of these issues further with you and your staff, please contact Matt Roberts, C.A.R. Federal Governmental Affairs Manager at matthewr@car.org or by phone at (213) 739.8284.

Sincerely,



Geoff McIntosh
2017 President, California Association of REALTORS®

cc: Bill Brown
2017 President, National Association of REALTORS®